

1 **MICHAEL MEE, ESQ**

Nevada Bar No. 13726

2 **LIBERATORS CRIMINAL DEFENSE**

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4 Attorney for Defendant

5 **UNITED STATES DISTRICT COURT**
6 **DISTRICT OF NEVADA**

7 UNITED STATES OF AMERICA,

8 Plaintiff,

9 v.

10 JAVIER GIOVANNI REYES RINCON,

11 Defendant.

Case No. 2:20-mj-000862-EJY

Stipulation to Continue Bench Trial
(Eighth Request)

12 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher
13 Chiou, Acting United States Attorney, and Joshua Brister, Assistant United States
14 Attorney, counsel for the United States of America, Michael Mee, Esq., counsel for the
15 defendant, that the bench trial in the above-captioned matter, currently scheduled for May
16 18, 2022 at the hour of 9:00 a.m., be vacated and continued for a period of approximately
17 thirty (30) days, to a convenient date and time to be determined by the Court in its
18 discretion.

19 This stipulation is entered into for the following reasons:

- 20
- 21 1. Defendant is out of custody and agrees to the continuance.
 - 22 2. As noted in the previous Stipulation and Order to Continue, Prior counsel Bret
23 O. Whipple, Esq. was suspended from practicing before this Court in January,
- 24

2022, and therefore, despite the lengthy pretrial proceeding in this case,
Defendant had no choice but to pursue other counsel.

3. That undersigned counsel Michael Mee was retained on January 21, 2022, and initially indicated that he expected to be able to proceed to trial in this case with a ninety (90) day extension, which this Court then Ordered.
4. That undersigned counsel Michael Mee, unfortunately, soon after that Seventh Stipulation was requested (the first request by counsel Mee), has undergone a series of personal matters which obstructed his initial expected timeline to prepare for trial in this case, specifically, Mr. Mee's child was born and has been in intensive care in the Hospital for the last two months, and continues to be in intensive care, which has deprived Mr. Mee of large amounts of time which he previously anticipated would be utilized to proceed promptly in the above-captioned case, thus unexpectedly necessitating the present Seventh Request to Continue.
5. That on this basis, Mr. Mee requested an additional continuance from counsel for the United States, and the parties have agreed to request continuing this matter for an additional (30) days.
6. That therefore the parties stipulate and request that this Continuance be granted by the Court.

DATED this 9th day of May, 2022.

/s/ Michael Mee, Esq.
MICHAEL MEE, ESQ
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/s/ Joshua Brister
JOSHUA BRISTER
Assistant United States Attorney
CHRISTOPHER CHIOU
Acting United States Attorney
Attorneys for Plaintiff

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4

5 Plaintiff,

6 v.

7 JAVIER GIOVANNI REYES RINCON,
8

9 Defendant.

Case No. 2:20-mj-00862-EJY

Order Continuing Bench Trial

10 Based on the pending stipulation of counsel, and good cause appearing therefore,

11 IT IS HEREBY ORDERED that the bench trial in the above-captioned matter
12 currently scheduled for May 18th, 2022, at the hour of 9:00 a.m. be vacated and continued to
13 the date of June 22, 2022, at the hour of 9:00 a.m. in Courtroom 3D.

14 DATED this 10th day of May, 2022

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17 _____
18 UNITED STATES MAGISTRATE JUDGE
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